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Quality Assurance in Defense Adjudication: An Adjudicator Workshop for Defining and Assessing Quality

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Defense Personnel Security Research Center

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14. ABSTRACT The Defense Personnel Security Research Center (PERSEREC) undertook a study to develop a definition of adjudication quality and outline a systematic approach that the Department of Defense (DoD) can adopt to assure the quality of adjudication decisions. Subject matter experts identified adjudication customers, products and services, and customer expectations and defined adjudication quality. <i>A quality adjudication decision is a timely eligibility determination by a qualified adjudicator in accordance with national personnel security program regulations, policies, and procedures.</i> The definition requires that standards and measures be established for timeliness, adjudicator qualifications, and adherence to guidelines. It was recommended that requirements be established in the DoD 5200.2-R for a DoD-wide quality assurance program and in JPAS for uniform reporting of adjudication case information and decision rationale. Further it was recommended that the program be developed and implemented with the participation of constituents with expertise and interest in adjudication. The program has the potential to facilitate reciprocity and trust among parties responsible for clearance eligibility determinations by assuring the quality of DoD adjudication.					
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Preface

A pressing need exists to improve the quality of personnel security investigations and adjudications in the Department of Defense (DoD). These products are an important part of the DoD Personnel Security Program, and the importance of their quality is especially salient given increased threats to the national security. In recent years, several audits and reviews have examined DoD investigative and adjudicative products, concluding that there is a need for improvement. In 1998 the DoD Inspector General released a report suggesting improvements would be achieved with implementation of a peer review program to ensure that the DoD Central Adjudication Facilities consistently meet performance standards. A report released by the Defense Personnel Security Research Center in 2000 indicated that the adjudication guidelines for determining eligibility for access to classified information were not being applied consistently at different levels of the clearance review process. In 2001, the United States General Accounting Office concluded that deficiencies in documentation of the adjudication process limited the ability of the department to identify and address potential problems, including inconsistent application of adjudication guidelines approved by the President.

To address these concerns, PERSEREC is conducting research and developing products to improve the quality of both personnel security investigations and adjudications. One of our primary goals is to develop uniform standards against which quality can be measured. The specific objectives for this research program are to: (1) define quality, (2) understand current procedures for managing quality, and (3) develop uniform quality assurance standards, measures, and procedures. These efforts will help ensure that high quality remains a cornerstone of the DoD Personnel Security Program.

This report is the first in a series and focuses on adjudication quality. It documents the views of adjudicators regarding current quality assurance procedures and outlines their ideas for developing a department-wide program to assess and improve adjudication quality. Their contributions lay the groundwork for future efforts aimed at evaluating and improving the quality of personnel security investigations and adjudications.

James A. Riedel
Director

Acknowledgments

The authors would like to thank those who supported this study and provided valuable input. We are particularly appreciative of the Central Adjudication Facility (CAF) chiefs and senior adjudicators who participated in the Adjudication Quality Workshop. They tackled the difficult task of defining quality adjudication and its basic elements. They also identified key issues that must be addressed in order to realize a Department of Defense adjudication quality assurance program. Without their expertise and patience, this effort would not have been possible. We hope their knowledge and concerns are accurately conveyed in this report.

Executive Summary

Executive Order 12968, *Access to Classified Information* (1995), “establishes a uniform Federal personnel security program for employees who will be considered for initial or continued access to classified information.” It states that “employees shall not be granted access unless they have been determined to be eligible for access based on a favorable adjudication of an appropriate investigation of the employee’s background.” The Department of Defense (DoD) directive and regulation for implementing EO 12968 are DoD 5200.2, *DoD Personnel Security Program* (1999), and DoD 5200.2-R, *DoD Personnel Security Program* (1987, Change 3-1996). The directive and regulation apply to DoD civilian, military, and contractor personnel and contain the policies and procedures governing the issuance, denial, and revocation of DoD security clearances for access to classified information and employment in sensitive positions. The DoD completes more than 400,000 adjudication actions per year.

Three studies have led to the conclusion that there is a need for a systematic approach to defining and measuring quality in adjudication within the DoD. Reports have indicated: (1) there may be differences in how senior adjudicators and CAF officials apply adjudicative guidelines (Carney & Marshall-Mies, 2000); (2) the department needs to institute “peer review” “to ensure that the work produced meets quality control standards (DoD Office of the Inspector General, 1998); and (3) the Department should establish “common quality assurance mechanisms to identify any problem areas needing clarifying guidance or training” (General Accounting Office, 2001). The current study was undertaken to develop a definition of adjudication quality and outline the basic requirements for assuring the quality of DoD adjudications. The study used subject matter experts to delineate Central Adjudication Facility (CAF) customers, products and services, and customer expectations.

In a June 2001 workshop, chiefs and senior adjudicators from all DoD CAFs addressed issues related to adjudication quality. Prior to developing a definition of adjudication quality, workshop participants identified adjudication customers, products and services, and customer expectations. The customers include: (1) ultimate users, such as the general public and U.S. government; (2) primary customers who are responsible for funding the adjudicative process and utilizing the products and for providing policy guidance and oversight of adjudicative products and services; and (3) secondary customers who receive CAF services but are not directly involved in other CAF’s policies or operations.

The products and services performed by the CAFs include initial clearance eligibility determinations, periodic reviews, continuing evaluation and monitoring of cleared individuals, denials and revocations, suitability and trustworthiness determinations for positions of trust, and special board screens. The different expectations of customers affect both the process and products of adjudication. Across all customers, these expectations include efficient CAF processes, assurance of investigative sufficiency, adjudicative decisions that adhere to Federal guidelines, adequate

documentation of adjudicative results, and consistent application of basic adjudication principles.

The examination of customers, products and services, and customer expectations resulted in the following definition of adjudication quality: *A quality adjudication decision is a timely eligibility determination by a qualified adjudicator in accordance with national personnel security program regulations, policies, and procedures.* This definition is composed of three important elements: timeliness; adjudicator qualifications; and adherence to adjudication regulations, policies, and procedures. For each of these elements, standards need to be set and measures developed to determine if the standards have been met.

The present study focuses on the development of procedures to assess adherence. Other efforts will develop procedures to assess timeliness and adjudicator qualifications. In each of these three areas it will be necessary to develop standards and measures by which quality can be assessed. When these three efforts are completed, there will be standards and measures in place that correspond to the definition of adjudication quality.

Workshop participants focused their attention on the design of a general framework to evaluate adherence to adjudicative guidelines within the DoD. The primary challenge is to develop case review procedures that indicate the guidelines were applied correctly. This general framework covered five key areas and identified questions that must be answered in the process of developing a successful case review program. The general areas addressed by the workshop include: (1) program policy and objectives, (2) documentation, (3) review methods, (4) evaluation standards and measures, and (5) feedback and reporting.

It is recommended that a DoD-wide adjudication quality assurance program be developed and implemented. This would be initiated by establishing a requirement for the program in the DoD 5200.2-R. The program should then be developed by a group of constituents with expertise in DoD security clearance adjudication.

Recommendation 1: Establish a requirement in the DoD 5200.2-R for a DoD-wide quality assurance program for personnel security adjudication.

The Assistant Secretary of Defense for Command, Control, Communication and Intelligence (C3I) should establish a DoD-wide quality assurance program for personnel security adjudications. The program should be designed to assure that DoD adjudications are timely, eligibility determinations by qualified adjudicators, and in accordance with national personnel security program regulations, policies, and procedures. The CAFs should assist C3I in the implementation of this DoD-wide quality assurance program.

Recommendation 2: Establish a requirement for uniform reporting of adjudication case information and decisions in the Joint Personnel Adjudication System (JPAS).

C3I should establish uniform reporting procedures for documenting adjudication case information and decisions in JPAS. At a minimum, the following information should be recorded:

- Unfavorable information by guideline
- All disqualifying factors
- All mitigating factors
- Case decision
- Rationale of decision that links case information with adjudicative guidelines in the application of national security standards.

Recommendation 3: Develop and implement the DoD-wide quality assurance program for personnel security adjudication.

C3I should convene a board of key constituents to include the CAFs, military services, DoD agencies, and C3I to design detailed specifications for a DoD-wide quality assurance program for personnel security adjudication. Development should include setting standards and measures for timeliness, adjudicator qualifications and adherence to guidelines. The Board should establish: (1) program policy and objectives, (2) documentation requirements, (3) review methodology, (4) evaluation standards and measures, and (5) feedback and reporting procedures. The program should be implemented according to the design specifications and reviewed periodically to assess its effectiveness and utility.

A Department-wide quality assurance program appears to be feasible in that experts were able to define adjudicative quality, identify elements that need to be considered, and outline a general framework for the program. The design and implementation of a Department-wide quality assurance program will be a difficult task, and will require the cooperation of C3I and all CAFs. Once implemented, the program has the potential to serve both C3I and the CAFs by providing annual feedback on the general quality of adjudications across DoD. The program also could facilitate reciprocity and trust among all parties responsible for clearance eligibility determinations by assuring the quality of DoD adjudications. In conclusion, a DoD-wide adjudication quality assurance program will require dedicated effort and resources, but assuring the quality of DoD adjudications will have far reaching benefits.

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Introduction

Background

Executive Order 12968, *Access to Classified Information* (1995), “establishes a uniform Federal personnel security program for employees who will be considered for initial or continued access to classified information.” It states that “employees shall not be granted access unless they have been determined to be eligible for access based on a favorable adjudication of an appropriate investigation of the employee’s background.” The Department of Defense (DoD) directive and regulation for implementing EO 12968 is DoD 5200.2, *DoD Personnel Security Program* (1999), and DoD 5200.2-R, *DoD Personnel Security Program* (1987, Change 3-1996). The directive and regulation apply to DoD civilian, military, and contractor personnel and contain the policies and procedures governing the issuance, denial, and revocation of DoD security clearances for access to classified information and employment in sensitive positions.

The DoD completes more than 400,000 adjudication actions per year. Eligibility for access to Confidential, Secret, Top Secret, and Sensitive Compartmented Information (SCI) is issued, denied, or revoked by one of ten Central Adjudication Facilities (CAFs)¹.

The standard for access to classified information or assignment to sensitive duties is “whether the facts and circumstances indicate the person’s loyalty, reliability and trustworthiness are such that entrusting the person with classified information or assigning the person to sensitive duties is clearly consistent with the national security interests of the United States” (DoD 5200.2-R, 1987). This standard is applied by an overall common sense determination based upon careful consideration of 13 adjudicative criteria and their security concerns, each of which is to be evaluated in the context of the whole person (DoD 5200.2-R, 1987, Change 3-1996).

Each of the 13 adjudicative criteria has a specific standard, which is further defined by conditions that could raise a security concern and may be disqualifying. The standard also specifies conditions that may mitigate disqualifying conditions. Each case must be judged on its own merits. Any doubt as to whether access to classified information is clearly consistent with national security is to be resolved in favor of national security.

¹ Army, Navy, and Air Force CAFs adjudicate all military and civilian clearances for their respective services, plus SCI for contractor employees working on military department contracts. The Washington Headquarters Service (WHS) CAF adjudicates all clearances except SCI for civilians assigned to Defense Agencies. The Defense Intelligence Agency (DIA) CAF adjudicates all SCI clearances for DIA employees and other Defense agency civilians. The National Security Agency (NSA) and National Reconnaissance Organization (NRO) CAFs adjudicate SCI for their employees. Personnel with the Joint Chiefs of Staff (JCS) are adjudicated by the JCS CAF. Contractor personnel with Confidential, Secret or Top Secret access are adjudicated by the Defense Industrial Security Clearance Office (DISCO). If contractor personnel have other than favorable information in their background, the case is also adjudicated by the Defense Office of Hearing Appeals (DOHA).

Three studies have led to the conclusion that there is a need for a systematic approach to defining and measuring quality in adjudication within the DoD. A Defense Personnel Security Research Center (PERSEREC) report on *Adjudicative Guidelines and Investigative Standards in the Department of Defense* (Carney & Marshall-Mies, 2000) indicated there may be differences in how senior adjudicators apply adjudicative guidelines and final CAF decisions. The report recommended a more detailed examination of consistency across and within the Department. About the same time, the DoD Inspector General (DoD Office of the Inspector General, 1998) recommended the Department institute “peer review” for the adjudicative process. These reviews are intended “to ensure that the work produced meets quality control standards. The reviews would ensure that established policies and procedures are being consistently applied across all DoD adjudication facilities and would also identify areas for improvement.” Finally in 2001, the General Accounting Office (GAO) (General Accounting Office, 2001) reported that DoD adjudication facilities do not consistently document the personnel security considerations in individual cases and consequently may not be in a position to assess the consistency with which the adjudicative guidelines are applied. GAO recommended the Department establish “common quality assurance mechanisms to identify any problem areas needing clarifying guidance or training.”

Concept of Quality and Its Relevance to Adjudication

Quality as a business process concept has evolved over the years and its application to adjudication is not straightforward. The concept of quality has its origins in the cultural shift that occurred when manufacturing moved from craft-based production to mass-produced industry. By emphasizing “conformance to specifications,” it became possible to manufacture large quantities of consistently accurate work, often at minimum cost. As business practices changed from a goods-producing economy to a service economy, notions of quality changed because services are not tangible and often involve a process instead of a physical product. Quality shifted away from production-driven requirements to consumer-driven requirements, namely, customer expectations.

Directly relevant to the current study is the translation of the concepts of quality from the business world to the public sector environment in which adjudication is performed. Three aspects of quality in the public sector have been identified (Löffler, 2001):

- Respect of norms and procedures,
- Effectiveness, and
- Customer satisfaction.

Respect of norms and procedures is a public administration version of “conformance to specifications.” It refers to the absence of arbitrariness and procedural errors and includes following the statutes and laws governing public service. Effectiveness is the extent to which the products and services accomplish the purpose for which they were designed. Customer satisfaction is a measure of how well the public service meets customer

expectations. These three aspects of quality in the public sector are directly relevant to the challenge facing DoD as it defines and assures the quality of personnel security adjudications. Adjudication is a service, designed to protect national security and governed by statutes and regulations, whose multiple customers expect it to perform efficiently. These are critical elements for the measurement of adjudication quality.

Purpose of the Study

This study is part of an overall effort to establish quality assurance as integral to DoD adjudication. The Department has plans to institute peer review of the CAFs that will include a review of completed cases. Before that program gets underway, it is necessary to have a DoD-wide definition of adjudication quality, to set standards that cover the definition, and to develop measures to assess how well the standards are met.

The current study was undertaken to develop a definition of adjudication quality and outline the basic requirements for assuring the quality of DoD adjudications. It used subject matter experts to generate a customer-oriented perspective of CAF customers, products and services, and customers' expectations. From this perspective, adjudication quality and its basic elements were defined.

Methodology

In June 2001, a 2-day workshop was convened for the purpose of defining adjudication quality and outlining a procedure the Department can use to help assure the quality of adjudicative decisions. The workshop was initiated with the understanding that defining quality in adjudication may be difficult. Adjudication is a complex process that requires the exercise of common sense and good judgment in applying standards and guidelines that are general rather than specific. There are many variables that affect the quality of decisions, such as the quality of investigations received by the CAFs, the clarity of adjudicative guidelines, the experience and training of adjudicators, and CAF resources and workload. To limit the scope of the workshop, investigative quality and revision of the adjudicative guidelines were precluded as workshop topics. While these are both important aspects of quality of the total personnel security system, the topics are being addressed in other research projects. Thus, the workshop focused solely on the quality of adjudication.

Two principles underpinned the workshop. The first was that experts should define adjudication quality. Consequently, workshop attendees were CAF Directors, Deputy Directors, and Senior Adjudicators. The following CAFs were represented at the workshop:

- Army Central Clearance Facility (CCF)
- Department of the Navy Central Adjudication Facility (DONCAF)
- Air Force Central Adjudication Facility (AFCAF)
- Washington Headquarters Service (WHS)
- Defense Intelligence Agency (DIA)

- Joint Chiefs of Staff (JCS)
- National Security Agency (NSA)
- National Reconnaissance Organization (NRO)
- Defense Industrial Security Clearance Office Investigative Service (DISCO)
- Defense Office of Hearings and Appeals (DOHA)

It is worth noting that, since the workshop participants were CAF officials, the workshop results represent their perspective about the quality of adjudication. It focuses on elements that they perceive to be most important, given the demands and pressures they face within their daily operating environment and their interactions with their various customers.

The second principle was that a DoD-wide quality assurance program should be observable and objective. This was considered important because the intent of a quality program is to assure that quality is an integral part of the CAFs products and services. One of the ways this is accomplished is by spelling out the procedures and results of an adjudication quality review.

The workshop participants carried out the following three steps:

1. They identified the adjudication process customers, products and services, and customer expectations.
2. They developed a general definition of adjudicative decision quality and described its basic elements.
3. They discussed a framework that could be used to evaluate the quality of adjudicative decisions.

The workshop utilized a general definition of quality from the International Organization of Standards (ISO) which states that quality is “*the ability to meet all the expectations of the user of goods or services.*”² This became the conceptual framework for the workshop and guided the questions that led to the definition of quality adjudication:

Who are CAF customers?
 What are CAF products and services?
 What are customers’ expectations for products and services?
 How is adjudication quality defined and what are its key elements?
 How can adjudication quality be assessed?

² The technical definition is “The totality of features and characteristics of a product or service that bear on its ability to satisfy stated or implied needs (National Institutes of Standards and Technology, 2000).”

Workshop Results

Adjudication Customers, Products and Services, and Customer Expectations

Adjudication Customers

Customers were defined as any group or organization that uses adjudication products and services provided by the CAFs. Customers served by the CAFs were identified and are listed in Table 1 below.

Table 1
Customers of Adjudication Products and Services

Ultimate Customers	American Public U.S. Government
Primary Customers	Military Departments Joint Chiefs of Staff Defense Agencies Defense Contractors Assistant Secretary of Defense for Command, Control, Communication, and Intelligence Director of Central Intelligence
Secondary Customers	Senate and Congressional Staffers Boards and Commissions CAFs as customers of other CAFs

There are many customers of CAF products and services. Because of its responsibility for national security, the United States government has mandated the Personnel Security Program in the public interest. This makes the general public and the U.S. Government ultimate customers of CAF products and services. The GAO and DoDIG support these interests with external evaluations of adjudication products and services.

The primary customers, or core constituents, are the Military Departments, Joint Chiefs, Defense Agencies, and Defense Contractors. They receive all CAF products and services on a daily basis. These primary customers are generally responsible for CAF policies and operations to include funding of the adjudication process. Additional primary customers provide policy guidance and oversight of adjudication products and services. The Assistant Secretary of Defense for Command, Control, Communications, and Intelligence (C3I) is primarily responsible for these policy guidance and oversight

functions. Similarly, the Director of Central Intelligence (DCI) is responsible for promulgating policy related to SCI adjudications.

Secondary customers include those who receive CAF products and services but are not directly involved in CAF policies, operations, or funding. Included are Senate and Congressional Staffers as well as Boards and Commissions who need access to DoD classified information. The CAFs are included as secondary customers of other CAFs since they receive each other's adjudications and have an interest in the quality of the determinations but have no direct role in other CAFs' procedures and operations.

Adjudication Products and Services

The CAFs' primary function is to ensure that individuals assigned to collateral³ and SCI positions are eligible for access to national security information. In addition, for positions of trust they ensure that individuals are suitable for employment with the Federal government and are trustworthy. In performing this function, the CAFs apply Federal guidelines to individual background information to make eligibility determinations.

The variety of products and services performed by the CAFs include:

- Initial collateral and SCI clearance eligibility determinations
- Periodic review for continued collateral and SCI clearance eligibility
- Continuing evaluation and monitoring of cleared individuals
- Denials and revocations
- Suitability and trustworthiness determinations for positions of trust that do not require a security clearance
- In some CAFs, Special Board Screens of individuals under consideration for general officer, sergeant major, and other senior military positions

Adjudication Customer Expectations

From the perspective of workshop participants, customer expectations can be categorized along three dimensions: efficiency, effectiveness, and documentation (Table 2). In adjudication, efficiency refers to the length of time and the amount of resources required to make an eligibility determination. Effectiveness refers to whether eligibility determinations adhere to adjudication guidelines and principles. Documentation is an expectation that is related to efficiency and effectiveness because it provides the details

³ Collateral clearances refer collectively to Confidential, Secret, and Top Secret clearances.

of eligibility determinations. It is of particular importance to CAF management and to C3I's policy and oversight functions.

Table 2
Customer Expectations: Efficiency, Effectiveness, and Documentation

Efficiency

Efficient CAF processes

- Timely decisions
- Efficient use of adjudication resources

Assurance of investigation sufficiency

- Investigation meets scope
- Leads followed-up to resolve issues

Effectiveness

Adherence to Federal Guidelines

- Trained and experienced adjudicators
- Rational and objective decisions

Consistent application of basic adjudication principles

- Protecting national security
- Fairness and equity to the individual
- Reciprocity

Documentation

- Record of issues
- Documentation of significant adverse information
- DCII contains accurate CAF decision information

Customer Efficiency Expectations. The most prominent expectation for the CAFs' products and services is timeliness. It overshadows all other expectations of the primary customers. The problem is that personnel often can neither begin nor continue working in sensitive or cleared positions unless the CAF has determined their eligibility. Delays in the security clearance process can cause serious problems for Department operations.

The importance of timely decisions has put added stress on the CAFs because a system-wide backlog of cases has begun to appear at the CAFs. This has resulted in increased processing time and concomitant demands on CAF resources, necessitating additional personnel and increased training. The situation has had a negative impact, especially on primary customers, and has the potential to adversely affect adjudication quality.

Related to efficient CAF processes, but also impacting effectiveness, is ensuring the sufficiency of investigations. CAFs need to ensure that investigations meet scope and that relevant leads are expanded. These tasks promote an effective personnel security system, but also stretch limited CAF resources because CAFs are performing the quality functions of other system components.

Customer Effectiveness Expectations. All customers expect adjudication decisions to adhere to the Federal guidelines. This requires that trained and experienced adjudicators apply the guidelines consistently, that the adjudication policy is clear and unambiguous, and that adjudication decisions are rational and objective.

Workshop participants emphasized the importance of general principles of adjudication: protecting national security, fairness, and reciprocity. These principles involve balancing the interests of national security with fairness and equity to the individual. Also, all CAFs are expected to assess similar background information the same way. This enables CAFs to accept reciprocally another CAF's decision without having to readjudicate. All of these principles rest on the consistent application of adjudicative guidelines.

Documentation. Documentation of adjudicative results is important to those customers who review adjudication decisions. This includes CAF managers who review internal performance, CAFs who accept other CAFs' adjudications, and officials who are responsible for policy and oversight. It is also requisite for a quality assurance program. Documentation of the adjudication process, including the rationale for eligibility determinations, enables independent review of adjudication for oversight and feedback to management. Documentation is necessary for evaluating performance at the level of the individual adjudicator, a team, or a CAF.

Definition and Key Elements of Adjudication Quality

Workshop participants were then asked to define and identify the key elements of quality in relation to adjudication decisions. Examination of customers, products and services, and customer expectations resulted in the following definition of adjudication quality:

<p><i>A quality adjudication decision is a timely eligibility determination by a qualified adjudicator in accordance with national personnel security program regulations, policies, and procedures.</i></p>

This definition is composed of three important elements: timeliness; adjudicator qualifications; and adherence to adjudication regulations, policies and procedures. Each element of the definition represents a customer expectation for some dimension of quality; however, there is an important distinction between these elements. Timeliness is a measure of a CAF's ability to serve its customers. It concerns the length of time to make an eligibility determination. Adjudicator qualifications and adherence to the guidelines are measures of the CAF's adjudication proficiency. They address the CAFs' knowledge and skills in applying guidelines to case materials. The assumption is the more qualified the adjudicator, the more likely the decision will adhere to the guidelines. Timeliness, qualifications, and adherence are interrelated and affect quality in different ways. A focus on timeliness to the exclusion of qualifications and adherence could result in a substandard product, whereas a focus on qualifications and adherence to the exclusion of timeliness could result in a well-considered but delayed decision. There needs to be a balance among these elements to produce quality adjudications. Each of these key elements is discussed briefly below.

Timeliness

Timeliness is an important concern to all customers. As discussed earlier, delays in the security clearance process can cause serious problems for both military and civilian operations. The ability to grant interim clearances helps mitigate the problem to some degree, but it also introduces an element of risk because individuals may be given access to classified information before completion of their background investigations.

An August 2000 memorandum from ASD, C3I, "Personnel Security Investigations," directed senior officials of the Defense Components to ensure the timely adjudication of completed investigations. In accord with this memorandum, the CAFs track timeliness by type of case and type of clearance eligibility. They also record significant events from completion of the investigation through the clearance eligibility decision, and present monthly reports to C3I. As yet, no standards have been established for timeliness of adjudication, but the CAFs report between 5 and 70 days on average to adjudicate non-issue cases and between 70 and 190 days on average to adjudicate issue cases. Since timeliness is an important element of adjudication quality, timeliness standards need to be set by C3I and the CAFs and incorporated into quality review.

Adjudicator Qualifications

Experienced adjudicators are an important aspect of adjudication quality because they help ensure that security issues are properly identified and the adjudicative guidelines are properly applied. Adjudicators become qualified through an apprenticeship system that combines formal classroom training with on-the-job training and mentoring. It can take up to three years for an adjudicator to become qualified for the full range of adjudicative issues. A recent PERSEREC report (Carney & Marshall-Mies, 2000) indicated that the civilian adjudication workforce has an average of 11 years of adjudicative experience. The civilian adjudicator workforce is currently being augmented

by military reservists. The reservists are in an apprenticeship status; they receive basic adjudicative training at their CAFs and their work is closely monitored by a team leader.

The DoD 5200.2-R has explicit standards about requisite grade levels for different adjudicative actions. Cases with no unfavorable or minor unfavorable information can be adjudicated by a civilian in grade GS-7/9 or a military officer in grade O-3. Cases with unfavorable information require a second review by an adjudicator in grade level GS-11/12 or O-4. For a Confidential or Secret clearance, a Statement of Reason (SOR) to deny or revoke clearance eligibility must be approved and signed by a GS-12/13 or O-4/5 and a final decision to deny or revoke must be approved and signed by a GS-14/15 or O-5. For access to Top Secret or SCI, the SOR to deny or revoke must be approved and signed by a GS-14 or O-5 and a final decision to deny or revoke must be approved and signed by a GS-15 or O-6.

Adjudicator training has been addressed by the Department on a continual basis. The Defense Security Service Academy (DSSA) offers a two-week basic course and a one-week advanced course in adjudication. Most journey-level adjudicators have completed the basic course at either DSSA or its predecessor, the DoD Security Institute (DoDSI), and are enrolled in advanced courses as CAF work schedules permit. The Department also is establishing a security professional certification program that will independently establish adjudicator qualifications. Core training requirements and certification are in formative stages, so training was not pursued further in this workshop. When these efforts are finalized, training standards need to be incorporated into quality review.

Adherence to National Personnel Security Program Regulations, Policies, and Procedures

While standards of timeliness and adjudicator qualifications are relatively easy to delineate and measure, standards of adherence to national personnel security program regulations, policies, and procedures are more difficult to define and measure. The access eligibility standards contained in Executive Order 12968 state that,

...eligibility for access to classified information shall be granted only to employees who are United States citizens for whom an appropriate investigation has been completed and whose personal and professional history affirmatively indicates loyalty to the United States, strength of character, trustworthiness, honesty, reliability, discretion, and sound judgment, as well as freedom from conflicting allegiances and potential for coercion, and willingness and ability to abide by regulations governing the use, handling, and protection of classified information. A determination of eligibility for access to such information is a discretionary security decision based on judgments by appropriately trained adjudicative personnel. Eligibility shall be granted only where facts and circumstances indicate access to classified information is clearly consistent with the national security interests of the United States, and any doubt shall be resolved in favor of the national security.

The DoD 5200.2-R provides standards and guidance for making an eligibility determination, as well as direction about issues to consider in an applicant's background. Change 3 of the regulation implements Executive Order 12968 and describes 13 areas of security concern, each with specific disqualifying and mitigating factors that adjudicators must consider in evaluating background information:

- A. Allegiance to the United States
- B. Foreign influence
- C. Foreign preference
- D. Sexual behavior
- E. Personal conduct
- F. Financial considerations
- G. Alcohol consumption
- H. Drug involvement
- I. Emotional, mental, and personality disorders
- J. Criminal conduct
- K. Security violations
- L. Outside activities
- M. Misuse of information technology systems

The DoD 5200.2-R requires adjudicators to perform "whole person" adjudication, which involves the exercise of common sense in making "discretionary security decisions." It provides nine additional factors to consider in making the whole person adjudication:

- The nature, extent, and seriousness of the conduct;
- The circumstances surrounding the conduct, to include knowledgeable participation;
- The frequency and recency of the conduct;
- The individual's age and maturity at the time of the conduct;
- The voluntariness of participation;
- The presence or absence of rehabilitation and other pertinent behavioral changes;
- The motivation for the conduct;
- The potential for pressure, coercion, exploitation, or duress; and
- The likelihood of continuation or recurrence.

It is clear from these requirements that adjudication is a complex judgmental process that involves evaluating a number of factors from the case file: personal events that indicate issue areas, disqualifying factors, mitigating factors, and other factors that either intensify or diminish the security significance of the background information. Because of the discretionary nature of security judgments, it will be difficult to measure the degree to which adjudicative standards are met. The largest obstacle facing a quality review program is developing ways to assess how well determinations meet adjudication standards.

Existing CAF Quality Programs

To assure that adjudicative actions conform to national and agency policies, programs, and procedures, many CAFs have built quality functions into their operations. There are quality programs that address adjudications for cases with both favorable and unfavorable information.

For cases with unfavorable information, all CAFs follow the provisions of DoD 5200.2-R that specify at least two levels of review for cases that are not completely favorable. If the CAF issues a Statement of Reasons (SOR) or a denial/revocation of clearance, there may be as many as four levels of review.

In addition to the review of cases required by the DoD 5200.2-R, many CAFs also have quality programs that address all adjudicative actions. In these programs senior adjudicators review adjudicated cases. Reviewers may be team leaders, supervisors, CAF managers or a designated review team. Generally, cases are randomly selected from the workflow. The selection strategy may be random from all cases adjudicated by the agency, random by adjudicator, random by case type, or random by adjudicator and case type. A few agencies review all adjudicated cases.

The CAF quality programs primarily serve a training function. Senior adjudicators monitor the ability of adjudicators to apply guidelines, make appropriate decisions, and properly prepare correspondence. Review includes whether the adjudicator recognized the appropriate guidelines for a case, properly annotated the internal case management system, and made the correct decision. Reviewers also check correspondence for grammar, spelling, and conformance to agency correspondence manuals. Training is initiated when deficiencies are evident.

All CAF quality programs involve maintaining a record of case processing, reviewing selected cases by a senior adjudicator, and assuring the quality of the adjudicative process by correcting deficiencies through individual training. In constructing a quality assurance program for the Department, it is reasonable to incorporate many of the mechanisms already in place at the CAFs. It is important to note, however, that not all CAFs have formal quality programs and, of those CAFs with formal programs, not all document or report their quality results in the same way. Thus, a Department-wide quality program will need to go beyond the existing CAF programs and standardize procedures for assessing quality.

General Framework to Evaluate Adherence to Adjudicative Guidelines

Designing an effective quality assurance program is a complicated undertaking that will require the concerted efforts of the various constituents, such as the CAFs, military services, DoD agencies, and C3I. Such a program will require the development of standards and measures for all aspects of quality adjudication, including timeliness, adjudicator qualifications, and adherence to national policies. The present study addresses only the development of procedures to assess adherence. The primary challenge is to

develop case review procedures that allow for assessing whether the guidelines were applied correctly. Other efforts will need to set acceptable, system-wide performance standards and measures of adherence to guidelines, timeliness and adjudicator qualifications. Successful completion of these efforts, will provide standards and measures that correspond to the definition of adjudication quality.

The present workshop began to address several of the main issues related to assessing adherence. This section of the report will summarize workshop participants' considerations of these issues. These issues can be grouped into five general areas:

- Program policy and objectives
- Documentation
- Review methods
- Evaluation standards and measures
- Feedback and reporting.

Program Policy and Objectives

As a first step, the DoD 5200.2-R will need to include a requirement for a Department-wide quality assurance program. Since administration of the program will require CAF assistance, CAF participation should also be required. C3I will need to ensure that the program has adequate logistical support. This may require that responsibility for program logistics rotates among the CAFs. These requirements should be included in the Regulation in order to provide the necessary impetus and direction for the activity.

Specific program objectives will need to be established. These objectives include, but are not limited to, oversight, policy improvement, and process improvement. It is important to recognize that these objectives may have greater salience for different constituents. Oversight and policy improvement are C3I responsibilities, whereas process improvement is a CAF responsibility. Without clear delineation and prioritization of the objectives, the program could become adversarial between C3I and CAF management. Since C3I requires CAF assistance for the program, failure to address these issues could render the program ineffective. In all, this requires that the program be independent, objective, and supportive of the different interests of the constituents. Consideration of these issues will determine how the quality assurance program will be structured to represent the different interests.

Documentation

Adjudication is a complex decision-making process that involves both acquiring and processing information (Stewart, 2001). The adjudicator first acquires information from the case material. Then, the adjudicator processes that information in accordance with the adjudication guidelines. Documentation is a means of capturing the information

acquisition and processing aspects of adjudication decision-making. It allows for an independent assessment of the completeness and accuracy of information acquired, or reviewed, in the case and the way in which the information was used to make an eligibility determination.

Workshop participants unanimously agreed that adjudicators should document certain elements of their decisions. In principle, it was agreed that adjudicators should provide a sufficient record to indicate to a reviewer that the adjudicators considered all available information and made a rational decision in accord with the adjudicative guidelines. At a minimum adjudicators need to:

- Document or acknowledge all unfavorable information, regardless of whether it is disqualifying or not;
- Identify and document all disqualifying factors;
- Identify and document all mitigating factors;
- Provide a narrative summary that links case information with adjudicative guidelines in the application of national security standards, and
- Record comments from all adjudicators who review cases that are not completely favorable.

For Periodic Reviews (PRs), where a subject's prior investigations are considered, it was agreed that documentation should only cover the period of the current investigation unless there are indications of a pattern of security-relevant behavior.

Workshop participants agreed that this documentation should be a part of the upcoming Joint Personnel Adjudication System (JPAS). "The JPAS represents a major technological leap for DoD personnel security professionals worldwide. It is a DoD system that will use the NIPRNET to connect security personnel around the world with a database managed by DoD CAFs" (<https://jpas.osd.mil/>). Documentation should be entered into JPAS when adjudicators complete action on a case. The advantage of using JPAS is that it does not unduly increase the burden on the CAFs since they will be using JPAS independently of the quality assurance program.

Participants strongly recommended that DoD provide guidance on what and how information should be entered into the JPAS record. This is necessary because of the high likelihood for inconsistency in recording relevant information. For instance, when considering which adjudicative guidelines apply to an issue, some adjudicators may consider admitted drug use to be both Criminal Conduct and Drug Involvement, while others may only consider the issue to be Drug Involvement. Without clear guidance about how to record the data, a review program will most likely find itself reconciling how to interpret issues rather than whether an adjudication meets quality criteria.

Perhaps an even more important documentation issue is the potential for inconsistency in writing the narrative summary and rationale for an adjudicative decision. C3I and the CAFs need to agree on procedures for writing the narrative summary to be

entered into JPAS. PERSEREC prepared Appendix A as draft instructions for entering information into JPAS. It is recommended that these instructions be reviewed and approved by both C3I and CAF management to ensure consistency. Instructions of this sort will need to be incorporated into adjudicator training and processes at each CAF so that DoD records are standardized across the CAFs and can be reviewed and evaluated by different members of the adjudication community.

Review Methods

With the above documentation as the record of adjudication, an independent review and evaluation can be conducted to assess the quality of adjudicative decisions.

There was considerable discussion about the concept of reviewing adjudicators' work, and participants voiced strong reluctance to having outsiders evaluate a CAF. At the same time, they expressed appreciation for the value of having professional adjudicators from other CAFs provide performance feedback. Participants generally agreed that evaluations by peers who understand personnel security adjudication would be useful for making process improvements.

There are at least two models for conducting peer review of cases. One model, proposed by the workshop participants, used a review team to perform a community-wide assessment of the quality of DoD adjudicative decisions. The review team would consist of senior adjudicators in grades GS-13/14 from each CAF. The team would meet annually for a 2-week period. They would review a randomly selected sample of cases from all CAFs according to a sampling strategy, which will need to be developed. These cases would contain all adjudicative material to include investigative files, adjudicative files (including procedural and intermediate files), and additional service records. All of the material would need to be collected in advance and be available when the review team convenes. An advantage of this model is that a single review team evaluates the work of all CAFs at the same point in time. This enables standardization of case selection, evaluation, and interpretation. This makes it possible to quickly identify Department-wide issues and trends. The disadvantage is that the model focuses on case review and has no direct observation of CAF processes. The model also requires considerable logistical planning and support to gather all the case materials.

A second model, currently under consideration by C3I, involves an *ad hoc* peer review team that would conduct on-site CAF visits. Each year three peer review teams would visit one CAF each, for a total of three CAF reviews per year. At this rate, it would take three years to review all CAFs. The teams will review CAF policies, procedures, and operations, and a limited number of cases. An advantage of this model is that the review team is *in situ*, thus allowing for direct observation and interaction with adjudicators and CAF officials. A disadvantage is that multiple teams could interpret evaluation criteria differently so the findings may not be comparable across the teams. Also, it would take three years before all the CAFs could be reviewed. This makes it difficult to identify trends and follow-up on recommendations.

To allow C3I to perform its oversight responsibility, PERSEREC recommends that both models include a data call. The data call should encompass all phases of CAF operations: organizational structure, budget, staffing, procedures, performance metrics, training, etc. The data call will change from time to time to reflect changes in program requirements. The types of information requested in the data call and their purposes are listed below:

- Cost Effectiveness/Resources. Organizational structure, budget, and staffing shall be reviewed to ascertain if the CAF has sufficient resources to perform its mission.
- Efficiency. Number of CAF actions per year and the automation available to assist the CAF in accomplishing its mission.
- Operational Procedures. CAF procedures and metrics to measure CAF performance.
- Quality and Consistency. CAF procedures and metrics to ensure clearance determinations are consistent and adhere to adjudicative guidelines.
- National Security versus Individual rights. Procedures for denying or revoking eligibility ensure national security as well as fair and equitable treatment.
- Other review. Any other areas identified through audits, previous reviews, etc.

Evaluation Standards and Measures

Standards and measures used to evaluate adjudication quality are an important part of the quality assurance program. For reviewers to evaluate adjudication quality, there need to be standards and measures to assess timeliness, adjudicator training, and adherence to guidelines. Standards and evaluation measures were not part of the present workshop, but will be an important next step for developing a quality review program. In the context of the present study, the focus is on evaluation criteria that will be used to assess the degree to which security clearance eligibility determinations adhere to the adjudicative guidelines.

As previously stated, the standard for access to classified information or assignment to sensitive duties is “whether the facts and circumstances indicate the person’s loyalty, reliability and trustworthiness are such that entrusting the person with classified information or assigning the person to sensitive duties is clearly consistent with the national security interests of the United States.” Each of the 13 adjudicative criteria has a specific standard, which is further defined by conditions that could raise a security concern and may be disqualifying. The standard also specifies conditions that may mitigate disqualifying conditions. Each case must be judged on its own merits. Any doubt as to whether access to classified information is clearly consistent with national security is to be resolved in favor of the national security.

While these standards are specific, their application in complex judgments is less clear. As acknowledged in the adjudicative guidelines, whole person adjudication is a “discretionary security decision.” This makes evaluation of prior decisions difficult because of the problems described by Stewart (2001) concerning the reliability of judgments between two observers of the same events. If a case is considered to be a set of facts, adjudicators may concentrate on and extract different sets of facts. Additionally, they may interpret extracted facts differently. This ensures that judgments will rarely be perfectly reliable and expertise does not appear to mitigate the problem (Stewart, 2001).

Research literature indicates that unreliability can be constrained somewhat by using analytical procedures. Analytical procedures create an overt, step-by-step defensible decision-making process, which, if documented, allows for a review of the decision rationale. Given these findings, the goal is to make the process of adjudication more analytical by requiring that adjudicators clearly document case issues, mitigating conditions, and their decision rationale. While there will never be perfect reliability or consistency, it will be possible for reviewers to determine if all the facts in the case were considered and the soundness of the judgments.

Since the goal is to ensure that the decision is sound and results from a documented, analytical process, some logical measures of adherence to the guidelines might include:

- Is documentation complete?
- Was all unfavorable information identified?
- Was all disqualifying information identified?
- Was all mitigating information identified?
- Were both disqualifying and mitigating information considered in the final determination?
- Is the decision rationale clearly recorded and does it link the case information to the adjudicative guidelines to include whole person factors?
- How was the standard for national security applied? (Were there doubts that access to classified information was consistent with national security? How were doubts resolved?)
- If the case has unfavorable information, has it received appropriate higher-level review?

Feedback and Reporting

The quality assurance program policies and objectives, documentation and review methods, and the evaluation standards and measures will directly affect the way results are reported. Therefore, it was not appropriate for workshop participants to develop

detailed reporting specifications. Instead, the discussion focused on issues surrounding how and to whom quality assurance findings should be reported.

To ensure the integrity of the Department-wide quality assurance program, it is important to be mindful of the interaction between what is reported and to whom and the key role the CAFs play in the review process. At issue is the extent to which individual CAF review findings are disseminated. To obtain objective participation of the CAFs in the review process requires assurance that the results be supportive of the Personnel Security Program and not be the basis for punitive action against the CAFs. As stated clearly by one of the participants, “We have no interest in building our own guillotine.” This is an important issue that is interrelated with program objectives and review methods. It needs consideration because it impacts all aspects of the design and implementation of the Department-wide quality review program.

Summary, Conclusion, and Recommendations

Summary of Results

The current study developed a definition of adjudication quality and outlined the basic requirements for assuring the quality of DoD adjudications. It used subject matter experts to generate a customer-oriented perspective of CAF customers, products and services, and customers’ expectations. CAF customers include: (1) ultimate users, such as the general public and U.S. government; (2) primary customers who utilize the products, fund the adjudicative process, and provide policy guidance and oversight; and (3) secondary customers who receive CAF products and services but are not directly involved in CAF policies, operations, or funding.

The products and services performed by the CAFs include initial clearance eligibility determinations, periodic reviews, continuing evaluation and monitoring of cleared individuals, denials and revocations, suitability and trustworthiness determinations for positions of trust, and special board screens. The different expectations of these customers affect both the process and the products of adjudication. Across all customers, these expectations include efficient CAF processes, assurance of investigative sufficiency, adjudication decisions that adhere to Federal guidelines, adequate documentation of adjudication results, and consistent application of basic adjudication principles.

The examination of customers, products and services, and customer expectations resulted in the following definition of adjudication quality: “A quality adjudication decision is a timely eligibility determination by a qualified adjudicator in accordance with national personnel security program regulations, policies, and procedures.” This definition is composed of three interrelated elements: timeliness; adjudicator qualifications; and adherence to adjudication regulations, policies, and procedures. Each of these elements needs to have standards and measures established to evaluate quality systematically.

Workshop participants focused their attention on the design of a general framework to evaluate adherence to adjudicative guidelines within the DoD. This general framework covered five key areas and identified issues that must be addressed in the process of developing a successful review program. These general areas include: (1) program policy and objectives, (2) documentation, (3) review methods, (4) evaluation standards and measures, and (5) feedback and reporting.

Conclusion

At the present time, C3I does not have a formal program to assure the quality of DoD adjudications. There are internal quality review programs at the CAFs, which are designed for process improvements and training purposes. However, in the absence of Department-wide standards and documentation of the factors considered in an adjudication, C3I cannot verify that DoD adjudications are timely, made by qualified adjudicators, and adhere to adjudication policy and guidelines. Thus, C3I needs to institute a Department-wide quality assurance program for personnel security adjudication.

A Department-wide quality assurance program appears to be feasible in that experts were able to define adjudication quality, identify elements that need to be considered, and outline a general framework for the program. The design and implementation of such a program will be a difficult task and will require the cooperation of C3I and all CAFs. Once implemented, the program has the potential to serve both C3I and the CAFs by providing feedback on the general quality of adjudications across DoD as well as information useful to the CAFs for process improvements. The program also has the potential to facilitate reciprocity and trust among all parties responsible for clearance eligibility determinations by assuring the quality of DoD adjudications. In conclusion, a DoD-wide adjudication quality assurance program will require dedicated effort and resources, but assuring the quality of DoD adjudications will have far reaching benefits.

Recommendations

It is recommended that a DoD-wide adjudication quality assurance program be developed and implemented. This should be initiated by establishing a requirement for the program in the DoD 5200.2-R. The program should then be developed and implemented by a group of constituents with expertise in DoD security clearance adjudication.

Recommendation 1: Establish a requirement in the DoD 5200.2-R for a DoD-wide quality assurance program for personnel security adjudication.

C3I should establish a requirement in the DoD 5200.2-R for a DoD-wide quality assurance program for personnel security adjudications. The program should be designed to assure that DoD adjudications are timely, and that eligibility determinations are made by qualified adjudicators, and in accordance with national personnel security program

regulations, policies, and procedures. The CAFs should assist C3I in the implementation of this DoD-wide quality assurance program.

Recommendation 2: Establish a requirement for uniform reporting of adjudication case information and decisions in JPAS.

C3I should establish uniform reporting procedures for documenting adjudication case information and decisions in JPAS. At a minimum, the following information should be recorded:

- Unfavorable information by guideline
- All disqualifying factors
- All mitigating factors
- Case decision
- Rationale of decision that links case information with the adjudicative guidelines in the application of national security standards.

Recommendation 3: Develop and implement the DoD-wide quality assurance program for personnel security adjudication.

C3I should convene a board of key constituents to include the CAFs, military services, DoD agencies, and C3I to design detailed specifications for a DoD-wide quality assurance program for personnel security adjudication. Development should include setting standards and measures for timeliness, adjudicator qualifications, and adherence to guidelines. The Board should establish: (1) program policy and objectives, (2) documentation requirements, (3) review methodology, (4) evaluation standards and measures, and (5) feedback and reporting procedures. The program should be implemented according to the design specifications and reviewed periodically to assess its effectiveness and utility.

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Appendix A

Joint Personnel Adjudication System (JPAS) Instructions for Entering Information into the Adjudication Summary Form

Joint Personnel Adjudication System (JPAS) Instructions for Entering Information into the Adjudication Summary Form

Documentation of adjudicative results is important because it provides a record of the details of eligibility determinations. It is of particular importance to those persons who review adjudication decisions. This includes Central Adjudication Facility (CAF) managers who review internal performance, CAFs who accept other CAFs' adjudications, and officials who are responsible for policy and oversight. It is also requisite for a quality assurance program. Documentation of the adjudication process, including the rationale for eligibility determinations, enables independent review of adjudication for oversight and feedback to management. Documentation is necessary for evaluating performance at the level of the individual adjudicator, a team, a CAF, or Department of Defense (DoD).

Data entry fields in JPAS include the adjudicative criteria as well as associated disqualifying and mitigating conditions from DoD Regulation 5200.2-R. The adjudication detail section contains a field for recording brief narrative summaries of the specific disqualifying conditions and mitigating conditions, if any, and the rationale for how the guidelines were applied to reach the decision.

The Adjudication Summary Form (ASF) is completed by adjudicators to document applicable adjudicative criteria and associated disqualifying and mitigating conditions by selecting items from a list. Specific disqualifying and mitigating conditions, as well as details regarding additional factors, are recorded along with the decision and the rationale for how the guidelines were applied to reach the decision. In all cases the adjudicator should indicate whether access to classified information is consistent with national security. The completed ASF should provide enough information to allow for an evaluation of the decision.

In cases where unfavorable information does not reach the threshold for a disqualifying condition, the case is considered to contain **minor** issue information. The adjudicator should indicate the appropriate adjudicative criteria and provide a brief narrative summary of the decision and the rationale for how adjudicative guidelines apply to the case. The adjudicator should indicate whether access to classified information is or is not consistent with national security.

In cases where unfavorable information reaches the threshold for a disqualifying condition, the case is considered to contain **major** issue information. The adjudicator should indicate the appropriate adjudicative criteria, the applicable disqualifying and mitigating conditions, and whether the issue is completely mitigated. The adjudicator should then provide a brief narrative summary of the disqualifying and mitigating factors, the decision, and the rationale for how adjudicative guidelines apply to the case. The adjudicator should indicate whether access to classified information is or is not consistent with national security.

Instructions for Completing the Adjudication Summary Form

In order to complete the ASF, first select the applicable adjudicative criteria (e.g., A, B, C, etc.) cited in the case. If derogatory information is present but does not meet the threshold for citing disqualifying conditions, then select applicable criteria and provide a brief narrative summary of the decision and the rationale for how adjudicative guidelines apply to the case. Otherwise, select all applicable Disqualifying Conditions (e.g., DCa, DCb, DCc, etc.). Next, select any applicable Mitigating Conditions (MCa, MCb, MCc, etc.). If the potentially disqualifying information has been mitigated, select *Mitigated* for that criterion. Finally, provide a brief narrative summary of the disqualifying and mitigating factors, the decision, and the rationale for how adjudicative guidelines apply to the case. In all cases indicate whether access to classified information is or is not consistent with national security.

Example 1. Decision Involving Major Derogatory Information

Figure 1 illustrates how to record a decision involving major derogatory information, or information that is potentially disqualifying. In this case, Applicant is a 44-year-old male who has an extensive history of drug use. He has used multiple drugs for a period of 26 years. In 1990 he successfully completed a drug rehabilitation program but continues to use marijuana occasionally. Prior drug use was not admitted on the SF86 or in the Subject Interview. Full disclosure of drug use was made only after scheduling a polygraph interview. Applicant stated his intention to continue using marijuana.

As can be seen in the example, Guidelines E and H have been selected. For Guideline E, Personal Conduct, Disqualifying Condition b (“DCb”) is checked because Applicant deliberately concealed and falsified relevant and material facts from the SF 86. “DCc” is checked because Applicant deliberately provided false or misleading information concerning relevant and material matters to the investigator. No mitigating conditions were applicable for this guideline.

For Guideline H, Drug Involvement, “DCa” is checked because of Applicant’s drug abuse. “DCe” is checked because Applicant continues to use marijuana despite having completed a drug treatment program. No mitigating conditions were checked

Obviously, The *Mitigated* boxes for Guidelines E and H have not been checked, since none of the issues were mitigated in this case.

Narratives have been written for Guidelines E and H that describe the circumstances related to each guideline. A decision has been entered, along with the rationale for how the adjudicative guidelines apply to the case. For the National Security Standard, a checkbox indicates access to classified information is not consistent with the interests of national security.

Adjudicative Guidelines & Conditions (Check all that apply)										
<input type="checkbox"/> A. Allegiance	<input type="checkbox"/> Dca ¹	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> Mca ²	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> B. Foreign Influence	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh		
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE					
<input type="checkbox"/> C. Foreign Preference	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh	<input type="checkbox"/> DCi	
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> D. Sexual Behavior	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input checked="" type="checkbox"/> E. Personal Conduct	<input type="checkbox"/> DCa	<input checked="" type="checkbox"/> DCb	<input checked="" type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF	<input type="checkbox"/> MCG			
<input type="checkbox"/> F. Financial Considerations	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe					
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF				
<input type="checkbox"/> G. Alcohol Consumption	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input checked="" type="checkbox"/> H. Drug Involvement	<input checked="" type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input checked="" type="checkbox"/> DCE					
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> I. Emotional	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc							
<input type="checkbox"/> J. Criminal Conduct	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF	<input type="checkbox"/> MCG			
<input type="checkbox"/> K. Security Violations	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb								
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> L. Outside Activities	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb								
<input type="checkbox"/> M. Information Technology	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE					

The narrative summary should clearly indicate specific disqualifying conditions, specific mitigating conditions, additional factors, decision rationale, decision, and whether access to classified information is or is not consistent with national security.

Disqualifying Conditions, Specific Mitigating Conditions, and Other Factors:

E. The applicant knowingly and willfully falsified his drug abuse history on the security questionnaire and during the subject interview. The falsifications had the potential to influence the course of the background investigation in areas of legitimate concern to the government. The applicant's failure to fully disclose his drug abuse history until confronted with the prospect of a polygraph examination suggests that he cannot be relied upon to speak the truth if the truth is contrary to his personal interests.

H. The applicant abused marijuana for 26 years, and intends to use marijuana in the future. Applicant used other drugs extensively prior to completion of a drug rehabilitation program in 1990. He has remained drug-free since then, except for occasional marijuana use. Drug use is likely to recur.

Decision: Deny. Disqualifying conditions were not mitigated. There is current drug use of marijuana and willful falsification of drug abuse history.

National Security Standard:
Access to classified information ____ is X is not consistent with national security.

¹ DCa, DCb, etc., refer to the Disqualifying Conditions (DCs) listed for each guideline in the DoD 5200.2-R.

² MCa, MCb, etc., refer to the Mitigating Conditions (MCs) listed for each guideline in the DoD 5200.2-R.

Figure 1. ASF for Decision Involving Major Derogatory Information

Example 2. Decision Involving Minor Derogatory Information

Figure 2 illustrates documentation of a case with only minor derogatory information. Applicant is a 28-year-old female whose credit report shows one 60-day late payment. Payment was made upon receipt of a notice from creditor. Applicant was also charged with driving in a HOV lane and fined in the amount of \$80.00. Fine was paid promptly. Since the derogatory information in this case does not reach the threshold for any disqualifying condition, only the boxes for Guideline F and J are checked.

The narrative indicates access was granted because no disqualifying background information was present. For the National Security Standard, the checkbox indicates that access to classified information is consistent with the interests of national security.

Adjudicative Guidelines & Conditions (Check all that apply)										
<input type="checkbox"/> A. Allegiance	<input type="checkbox"/> Dca ¹	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> Mca ²	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> B. Foreign Influence	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh		
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCe					
<input type="checkbox"/> C. Foreign Preference	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh	<input type="checkbox"/> DCi	
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> D. Sexual Behavior	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> E. Personal Conduct	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCe	<input type="checkbox"/> MCf	<input type="checkbox"/> MCg			
<input checked="" type="checkbox"/> F. Financial Considerations	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe					
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCe	<input type="checkbox"/> MCf				
<input type="checkbox"/> G. Alcohol Consumption	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> H. Drug Involvement	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe					
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> I. Emotional	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc							
<input checked="" type="checkbox"/> J. Criminal Conduct	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCe	<input type="checkbox"/> MCf	<input type="checkbox"/> MCg			
<input type="checkbox"/> K. Security Violations	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb								
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> L. Outside Activities	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb								
<input type="checkbox"/> M. Information Technology	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCe					

The narrative summary should clearly indicate specific disqualifying conditions, specific mitigating conditions, additional factors, decision rationale, decision, and whether access to classified information is or is not consistent with national security.

Disqualifying Conditions, Specific Mitigating Conditions, and Other Factors:
F. Applicant was 60 days late with payment to creditor. Applicant made payment after receiving written request from creditor. Issue resolved two years prior to close of record.
J. Applicant cited for exceeding the maximum speed limit on State A highway. Applicant paid fine in a timely manner. Case closed 14 months prior to close of record.
Decision: Grant. No disqualifying background information.

National Security Standard:
Access to classified information X is ___ is not consistent with national security.

¹ DCa, DCb, etc., refer to the Disqualifying Conditions (DCs) listed for each guideline in the DoD 5200.2-R.

² MCa, MCb, etc., refer to the Mitigating Conditions (MCs) listed for each guideline in the DoD 5200.2-R.

Figure 2. ASF for Decision Involving Minor Derogatory Information

Example 3. Decision Involving Significant Issues That Have Been Mitigated

Figure 3 indicates a case with significant financial issues that have been mitigated. In this case, Applicant is a 24-year-old male who had extensive credit card debt. Debt was accumulated over a 4-year period and Applicant only made minimum payments on an irregular basis. After receiving warnings from credit issuers, Applicant realized spending habits were counter-productive and enrolled in credit counseling. Applicant eliminated consumer debt in 18 month period and during the subsequent 12 months has not incurred any additional debt.

As can be seen in the example, Guideline F, Financial Considerations, has been selected. Disqualifying Condition a (“DCa”) because Applicant had a history of not meeting financial obligations. Mitigating Condition d (“MCd”) was selected because Applicant voluntarily entered financial counseling and demonstrates that the problem has been resolved. Since the issue was mitigated, the *Mitigated* box for Financial Considerations was checked. The narrative indicates the extent to which financial obligations were not satisfied and the actions taken to remedy the situation. A decision to grant access has been entered along with a rationale of how the adjudicative guidelines apply to the case. For the National Security Standard, a checkbox indicates access to classified information is consistent with national security.

Adjudicative Guidelines & Conditions (Check all that apply)										
<input type="checkbox"/> A. Allegiance	<input type="checkbox"/> Dca ¹	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> Mca ²	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> B. Foreign Influence	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh		
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE					
<input type="checkbox"/> C. Foreign Preference	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf	<input type="checkbox"/> DCg	<input type="checkbox"/> DCh	<input type="checkbox"/> DCi	
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> D. Sexual Behavior	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> E. Personal Conduct	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF	<input type="checkbox"/> MCG			
<input checked="" type="checkbox"/> F. Financial Considerations	<input checked="" type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe					
<input checked="" type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input checked="" type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF				
<input type="checkbox"/> G. Alcohol Consumption	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCe	<input type="checkbox"/> DCf				
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> H. Drug Involvement	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd	<input type="checkbox"/> DCE					
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> I. Emotional	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc							
<input type="checkbox"/> J. Criminal Conduct	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE	<input type="checkbox"/> MCF	<input type="checkbox"/> MCG			
<input type="checkbox"/> K. Security Violations	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb								
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd						
<input type="checkbox"/> L. Outside Activities	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb								
<input type="checkbox"/> M. Information Technology	<input type="checkbox"/> DCa	<input type="checkbox"/> DCb	<input type="checkbox"/> DCc	<input type="checkbox"/> DCd						
<input type="checkbox"/> Mitigated	<input type="checkbox"/> MCa	<input type="checkbox"/> MCb	<input type="checkbox"/> MCc	<input type="checkbox"/> MCd	<input type="checkbox"/> MCE					

The narrative summary should clearly indicate specific disqualifying conditions, specific mitigating conditions, additional factors, decision rationale, decision, and whether access to classified information is or is not consistent with national security.

Disqualifying Conditions, Specific Mitigating Conditions, and Other Factors:
F. Applicant acquired credit card debt in the amount of \$10,000, which was excessive for his annual income of \$24,000. Credit card payments were irregular resulting in notices from multiple creditors. Applicant voluntarily enrolled in credit counseling program and removed debt in 18 months. No new debt incurred in past year.
Decision: Grant. While Applicant has had a history of not meeting financial obligations, he has received counseling and the problem appears under control.

National Security Standard:
Access to classified information X is ___ is not consistent with national security.

¹ DCa, DCb, etc., refer to the Disqualifying Conditions (DCs) listed for each guideline in the DoD 5200.2-R.

² MCa, MCb, etc., refer to the Mitigating Conditions (MCs) listed for each guideline in the DoD 5200.2-R.

Figure 3. ASF for Decision Involving Significant Issues That Have Been Mitigated